

**DECLARATION OF AARON B. SOLEM IN SUPPORT OF PETITIONER'S
MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF**

Aaron B. Solem does hereby declare:

1. I am a staff attorney at the National Right to Work Legal Defense Foundation, Inc., and am one of the counsel of record for Petitioner Laura Sands.
2. The current due date for Petitioner's opening brief is January 21, 2015. Petitioner requests a 21-day extension of time, until February 11, 2015, to accommodate the schedule of the undersigned counsel. No prior extensions of time have been requested.
3. I am the attorney who is principally responsible for drafting Petitioner's brief, and the current schedule does not permit me adequate time to devote to the preparation of the brief. I am primarily responsible for the opening brief in another matter before this Court, *Lopez, et al. v. NLRB*, Case Nos. 14-1095, 14-1100, 14-1111, which is due January 16, 2015. In addition to *Lopez*, I have other work-related obligations, including, but not limited to, a brief due on January 14, 2015, before the Michigan Employment Relations Commission in a case of first impression under the newly enacted Michigan Right to Work Law. Lastly, I am currently scheduled to be out of the office on a long-planned family vacation from December 23 to January 2, 2015, and I also plan to be out of the office on January 19-20, 2015, for personal matters.
4. Prior to filing this motion for an extension of time, I contacted James

Coppess, counsel for the Intervenor, and Doug Callahan, counsel for the Respondent NLRB. Both stated that their clients do not oppose this request for an extension of time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 15, 2014, in Springfield, Virginia.

/s/ Aaron B.Solem
Aaron B. Solem

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2014, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: December 15, 2014

By: /s/ Aaron B. Solem

Aaron B. Solem

c/o National Right to Work Legal

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